

# **APPENDIX B**

From : RMMetcho@MDWCG.com  
To : Cassandra P. Miller  
Sent : 9/08/2015 8:51AM  
Subject : RE: Elaine v. Credit Control - Rule 37 and 408

Cassandra:

With the holiday, my clients have been delayed in providing responses to Plaintiff's discovery requests. As such, please let me know if you would agree to an additional extension through Friday, September 11, 2015 for Defendants to provide the responses. We will, of course, do our best to get the responses over to you before Friday.

Thank you,

Ron



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**From:** Cassandra P. Miller [<mailto:cmiller@edcombs.com>]  
**Sent:** Friday, August 28, 2015 12:17 PM  
**To:** Metcho, II, Ronald M.  
**Cc:** James Lattuner; Carlo Sabatini  
**Subject:** RE: Elaine v. Credit Control - Rule 37 and 408

Ron,

We have no objection to an extension to 9/4/15 on the discovery responses. Please forward the net worth and class information when you receive it so that we can make an initial offer.

Thank you,

Cassandra

Cassandra P. Miller  
Edelman, Combs, Lattuner & Goodwin, LLC  
20 S. Clark St., Suite 1500  
Chicago, IL 60603  
(312) 739-4200  
(312) 419-0379 (fax)

**From:** Metcho, II, Ronald M. [<mailto:RMMetcho@MDWCG.com>]

**Sent:** Friday, August 28, 2015 11:10 AM  
**To:** Cassandra P. Miller  
**Cc:** James Latturmer; 'Carlo Sabatini'  
**Subject:** RE: Elaine v. Credit Control - Rule 37 and 408

Cassandra:

Thank you for the email.

I am awaiting approval of the draft discovery responses from each of my clients. Would you be will to grant an extension through September 4, 2015 for Defendants to provide responses to Plaintiff's discovery requests?

I have made requests to each of my clients to provide their most recent net worth information and Credit Control is working on obtaining a number regarding the letters that were sent. After this information is obtained we can have a meaningful conversation regarding settlement.

Thank you,

Ron



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**From:** Cassandra P. Miller [<mailto:cmiller@edcombs.com>]  
**Sent:** Tuesday, August 25, 2015 11:27 AM  
**To:** Metcho, II, Ronald M.  
**Cc:** James Latturmer  
**Subject:** Elaine v. Credit Control - Rule 37 and 408

Ronald,

I wanted to let you know that James Latturmer and myself will be taking over the above referenced case on behalf of Tom Soule. Our files indicate that Defendants were given until August 21, 2015 to respond to Plaintiff's discovery, however, we have not received any responses. Were they sent by email or US mail only. If you could let me know where we are with discovery, I would appreciate it. Also, I was wondering if your client had any interest in trying to resolve this case early on. If so, we would need class size and net worth information.

Please let us know if you would like to discuss further.

Thank you,  
Cassandra

Cassandra P. Miller  
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